UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

ALLISON HETRICK, individually and on behalf of all others similarly situated,

Plaintiff,

Civil Action No. 1:25-cv-10103

v.

ASCEND LEARNING, LLC,

Defendant.

MOTION FOR ADMISSION PRO HAC VICE OF TYLER K. SOMES ON BEHALF OF PLAINTIFFS

William F. Sinnott, as a member in good standing of the Massachusetts Bar and of the Federal District Court of the District of Massachusetts, in accordance with Rule 83.5.3 of the Local Rules of the U.S. District Court for the District of Massachusetts, respectfully moves this Honorable Court for the admission of Tyler K. Somes, Esquire, to practice law *pro hac vice* before this Court in this matter. As grounds, therefore, Attorney William F. Sinnott hereby certifies, and states as follows:

- 1. William F. Sinnott (the "Undersigned") is a member in good standing of the Massachusetts Bar and has been licensed to practice law before the Courts of the Commonwealth of Massachusetts since 1985;
- 2. The Undersigned is admitted to practice law before the Federal District Court for the District of Massachusetts;
- 3. The Undersigned intends to act as local counsel in this matter for Plaintiffs. As such, the Undersigned seeks to have Attorney Tyler K. Somes admitted *pro hac vice* to serve as co-counsel for Plaintiffs;

- 4. Tyler K. Somes, Esquire is a member in good standing of the bar for the District of Columbia and has been a member of that bar since May, 2023, *see* signed Certification of Attorney Tyler K. Somes attached hereto as *Exhibit 1*;
- 5. Tyler K. Somes, Esquire is a member in good standing of every jurisdiction where he has been admitted to practice law;
 - 6. Tyler K. Somes, Esquire has no disciplinary proceedings pending against him;
- 7. Tyler K. Somes, Esquire has not previously had a *pro hac vice* admission (or other limited purpose admission) to this Court revoked for misconduct;
- 8. Tyler K. Somes, Esquire, has read and agrees to comply with the Local Rules of the U.S. District Court for the District of Massachusetts; and
 - 9. The address for Tyler K. Somes, Esquire, is as follows:

Tyler K. Somes
District of Columbia Bar No. 90013925
HEDIN LLP
1100 15th Street NW, Ste 04-108

Washington, DC 20005
Telephone: (202) 900-3332
tsomes@hedinllp.com

WHEREFORE, William F. Sinnott, Esquire, hereby moves this Honorable Court for the grant of an order allowing Tyler K. Somes, Esquire, to appear *pro hac vice* in this matter.

By: /s/ William F. Sinnott
William F. Sinnott, BBO #547423
HINCKLEY, ALLEN & SNYDER LLP
28 State Street
Boston, MA 02109
wsinnott@hinckleyallen.com
Tel: (617) 345-9000
Fax: (617) 345-9020

ATTORNEY FOR PLAINTIFFS

CERTIFICATE OF SERVICE

I, William F. Sinnott, hereby certify that this document filed through the ECF system will

be sent electronically to the registered participants as identified on the Notice of Electronic Filing

(NEF) and paper copies will be sent to those indicated as non-registered participants.

Dated: January 23, 2025 /s/ William F. Sinnott

William F. Sinnott